

March 21, 2017

To: Federal Communications Commission

From: Totelcom Communications, LLC and North Texas Telephone Company

Re: Forbearance Notification

WC Docket No. 11-42 – Lifeline and Link Up Reform and Modernization

Totelcom Communications, LLC (Totelcom; SAC 442060) and North Texas Telephone Company (NTTC; SAC 442043) hereby notify the FCC that they are availing themselves of forbearance relief granted by the *Lifeline Modernization Order*<sup>1</sup> from the obligation to offer Lifeline-supported broadband Internet access service. Totelcom and NTTC are owned by TOTE Holdings LLC.

Totelcom and NTTC are eligible telecommunications carriers (ETCs) that receive Alternative Connect America Cost Model (A-CAM) support in Texas. The Companies elect forbearance relief for those census blocks in its study areas that are not funded under A-CAM. The Companies do not receive high-cost support for those unfunded census blocks and are not subject to high-cost public interest broadband obligations in them. What follows is the information the Wireline Competition Bureau has requested in these notifications.<sup>2</sup>

- 1. Carrier Names: Totelcom Communications, LLC and North Texas Telephone Company
- 2. ETC Designation Information
  - a. *ETC Designation Order*: Public Utility Commission of Texas; General Counsel's Petition for Designation of Eligible Telecommunications Carriers Under 47 U.S.C.

<sup>&</sup>lt;sup>1</sup> Lifeline and Link Up Reform and Modernization et al., WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (2016) (*Lifeline Modernization Order*). In particular, the *Lifeline Modernization Order* forbore from requiring high-cost support recipients to offer Lifeline-supported broadband in areas where they are not receiving high-cost support or are not subject to high-cost public interest broadband obligations. *Id.*, 31 FCC Rcd 4074-75, paras. 309, 311, 312.

<sup>&</sup>lt;sup>2</sup> Wireline Competition Bureau Provides Guidance Regarding Filing Procedures for Eligible Telecommunications Carriers Seeking to Invoke Forbearance Granted by Lifeline Modernization Order, WC Docket No. 11-42, Public Notice, 31 FCC Rcd 12672 (2016).

§214(e); Project No. 18100; Approving/Denying/Abating Applications for Designation as Eligible Telecommunications Carrier; Order No. 3; December 10, 1997.

Note: Totelcom and NTTC were designated as ETCs under the same Order. Totelcom was designated under the name Comanche County Telephone Company, Inc. Comanche County's name was changed to Totelcom Communications, LLC in December 2009 (reference Docket No. 37828).

- b. Designating Authority: Public Utility Commission of Texas
- c. Type of Designation: High-cost support recipient (i.e., not Lifeline-only)
- d. Date of ETC Designations: December 10, 1997 for both companies.
- 3. Areas Where ETC Seeks Forbearance: The Excel file that accompanies this notification contains lists of the census blocks, in numerical order by FIPS code, where Totelcom and NTTC are availing themselves of forbearance relief. The listed census blocks are all those within each of the Companies' ETC-designated service areas that are not funded under A-CAM.
- 4. Date and Reason for Change: Totelcom and NTTC received their first A-CAM support payments on February 28, 2017. Therefore, as of that date, the Companies no longer receive high-cost support for census blocks within their designated service areas that are not funded under the model and are not subject to broadband public interest obligations in those blocks.
- 5. Information on Areas Where Carrier Elects to Offer Broadband: Notwithstanding the forbearance relief Totelcom and NTTC are claiming for their census blocks that do not receive A-CAM support, the Companies still intend to offer Lifeline-supported broadband in those blocks to the extent qualifying service is available.

Please feel free to contact me at (254)893-1000 or toney.prather@totelcom.net if you have any questions or require additional information.

Sincerely,

one from Toney Prather

President